

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<p>MED-ASIA SHIPPING LTD.,</p> <p style="text-align: center;">- against -</p> <p>COSCO BEIJING INTERNATIONAL FREIGHT CO., LTD.,</p>	<p>X</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>Plaintiff,</p> <p>Defendant.</p>	<p>07 Civ. 9624 (RMB)</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>
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**VERIFIED ANSWER TO COUNTERCLAIM**

Plaintiff, MED-ASIA SHIPPING LTD. ("Plaintiff") by and through its attorneys, Lennon, Murphy & Lennon, LLC, as and for its Verified Answer to the Counterclaim<sup>1</sup> by the Defendant, COSCO BEIJING INTERNATIONAL FREIGHT CO., LTD. ("Defendant"), alleges, upon information and belief, as follows:

1. Admits that under the law and procedure of Hong Kong the prevailing party is entitled to recover its attorneys fees and other expenses.
2. Admits that if Defendant is deemed to be the prevailing party in the Hong Kong arbitration that it will be entitled to seek recovery of its attorneys fees and other expenses but, except as so specifically admitted, denies the remainder of the allegations of the second paragraph of the Defendant's counterclaim.
3. Admitted.<sup>2</sup>
4. Denied.
5. Denied.

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<sup>1</sup> Defendant's Counterclaim is set out at paragraphs 17 – 21 of its Verified Answer and Counterclaim.

<sup>2</sup> Subsequent to Defendant filing its Verified Answer and Counterclaim the Plaintiff has obtained full security for its claim as alleged in its Verified Complaint.

**WHEREFORE**, the Plaintiff, MED ASIA SHIPPING LTD., prays that this Honorable Court enter judgment in its favor dismissing Defendant's Verified Counterclaim including an award of the reasonable attorneys' fees incurred in defending Defendant's Motion Seeking Countersecurity, and that Plaintiff be granted such other and further relief as this Court may deem to be just and proper.

Dated: February 21, 2008  
Southport, CT

The Plaintiff,  
MED-ASIA SHIPPING LTD.

By 

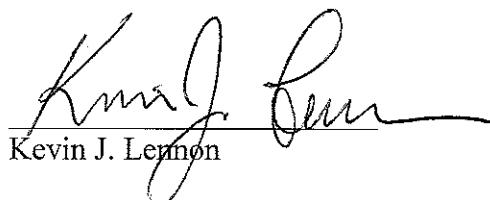
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**ATTORNEY'S VERIFICATION**

State of Connecticut )  
                       )  
                       ss.: Town of Southport  
County of Fairfield )

1. My name is Kevin J. Lennon.
2. I am over 18 years of age, of sound mind, capable of making this Verification, and fully competent to testify to all matters stated herein.
3. I am a partner in the firm of Lennon, Murphy & Lennon, LLC, attorneys for the Plaintiff.
4. I have read the foregoing Verified Answer and know the contents thereof and believe the same to be true and accurate to the best of my knowledge, information and belief.
5. The reason why this Verification is being made by the deponent and not by the Plaintiff is that the Plaintiff is a business organization with no officers or directors now within this District.
6. The source of my knowledge and the grounds for my belief are the statements made, and the documents and information received from, the Plaintiff and agents and/or representatives of the Plaintiff.
7. I am authorized to make this Verification on behalf of the Plaintiff.

Dated: February 21, 2008  
Southport, CT

  
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Kevin J. Lennon